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DECLARATION OF BARBARA DECELLE

I, BARBARA DECELLE, declare as follows:

1. I am a member of the Church of Scientology and have been employed by divisions of said Church since April 1976. This declaration is based on my personal knowledge, and I can competently testify thereto if called as a witness.

2. In March 1981 I was assigned to secretarial duties for a temporary unit established within the CHURCH OF SCIENTOLOGY OF CALIFORNIA (hereafter "CSC"), and I performed said duties until July 1981 when the unit disbanded and I was assigned to the Personal Public Relations Office (hereafter "PPRO"), a division within CSC. Defendant ARMSTRONG, who was assigned to PPRO, was responsible for maintaining an archives within the same suite of offices in which this temporary unit was based. I remained working in this suite following my assignment to PPRO, and was there on and off throughout the remainder of 1981.

3. The entire suite of offices, including the archives, was considered to be, and operated as, a "high security" and confidential area. Access to the area was limited to those assigned to duties there or to those who had a need to enter the area for some reason, in which case those persons were required to first obtain authorization and then allowed to enter only with an escort.

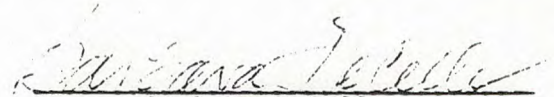
4. The physical layout of this suite was such that anyone desiring entry, unless they were an employee and already in the building, first had to pass through a reception area. Entry to the suite then required a key, or a phone call to someone already inside, in order to enter through a metal door. Once inside the suite, each individual office was also locked and required a key or approval from the authorized person to

1 enter. The office containing the archives, which had formerly been an
2 x-ray room when the building belonged to a hospital, had thick concrete
3 walls and roof along with a wood panelled lead door. The archives files
4 were maintained in locked file cabinets within this office, thereby
5 requiring a minimum of three keys in order to gain access to them.

6 5. As the above demonstrates, the value and confidentiality of the
7 archives was recognized by all concerned. Every effort was made to
8 safeguard the materials, even to keeping the specific location of this
9 archives limited to only those who needed to know that information.

10 I declare under penalty of perjury that the foregoing is true and
11 correct.

12 Executed this 7th day of October 1983 in Los Angeles, California.

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15 Barbara DeCelle

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